

(2) Status reports and activity logs produced by SAUSA Watson include significant details related to ongoing cases in the U.S. Attorney's Office including discussions with AUSA Taylor and others. Per the *Touhy* rules these documents cannot be released without DOJ approval.

(3) The successor SAUSA's contract/MOU provides for termination of the SAUSA's services upon thirty (30) days' notice by either the City or the SAUSA. *See*, Contract/MOU of Blake Watson. [Bates Stamp Nos. 0464-0468]. SAUSA Watson remains in his position in accord with his satisfactory performance.

(4) Predecessor SAUSAs

The successor SAUSA's caseload records are contained in his "activity notes." However, these notes contain information related to open criminal investigation files, confidential informants, notations related to edits involving indictments, plea agreements, as well as information related to debriefing of those with criminal charges. As such, these "activity notes" are considered highly confidential and subject to *Touhy* approval from the DOJ before being distributed. The federal court PACER System is capable of providing the information sought by this request and can be as easily accessed by the Plaintiff as by the Defendant. *See*, also Bates Stamp Nos. 1385-1389 and 1390-1400].

4. Please produce all documents, things and ESI related to the investigation and attempted seizure of "Robert Voe," including internal affairs reports. Please particularly include any statements made by each individual Defendant officer. If transcripts have been made of any 911

calls, please include such transcripts. For any excluded documents, please attach a privilege log, or produce a redacted copy consistent with the Protective Order.

RESPONSE: The 911 recording and CAD report are provided. [Bates Stamp Nos. 0995-0996]. Telephone records of Officer Jason Lewis and Sgt. Jim Talmadge are provided. [Bates Stamp Nos. 0993-0994]. In addition, the following documents are provided:

- (i) May 5, 2021 BOLO. [Bates Stamp No. 0179].
- (ii) May 7, 2021 Weekly Crime Report [Bates Stamp Nos. 0180-0199].
- (iii) Jane Doe files (previously produced). [Bates Stamp Nos. 0388-0449].
- (iv) Emails to Dahl. [Bates Stamp Nos. 1020-1244].
- (v) Record of pole camera installation dates. [Bates Stamp Nos. 1401-1402].
- (vi) Thumb drive marked “Attorney Eyes Only” re: investigative file of Jane Doe (M. E.);
- (vii) Thumb drive marked “Attorney Eyes Only” re: investigative material of Jane Doe (K. H.).

5. Please produce all records in your possession regarding arrests, criminal charges, and convictions of “Robert Voe,” including copies of any “roll-call” and/or “arrest book” desk book entries which contain “Voe’s” name.

RESPONSE:

- (1) Sealed Indictment dated April 13, 2021;
- (2) North Carolina felony conviction. [Bates Stamp Nos. 1403-1412];